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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Jacobie A. Wilson,

Defendant.

Case: 4:22-cr-20610

Judge: Kumar, Shalina D.

MJ: Ivy, Curtis

Filed: 11-16-2022 At 01:26 PM

SEALED MATTER (tt)

Violations:

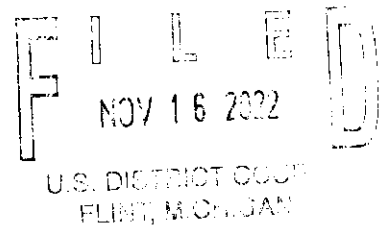
18 U.S.C. § 924(c)(1)(A)

21 U.S.C. § 841(a)(1)

18 U.S.C. § 922(g)(1)

INDICTMENT

THE GRAND JURY CHARGES:



Count One

18 U.S.C. § 924(c)(1)(A)

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

1. On or about November 16, 2021, in the Eastern District of Michigan, Defendant, Jacobie Wilson, knowingly and unlawfully possessed a firearm, that is, a Taurus, model PT111, 9mm, semi-automatic pistol, and a Springfield, model XDS, .45 caliber, semi-automatic pistol, and a Hi-Point, model C9, 9mm, semi-automatic pistol, and a Glock, model 19x, 9mm, semi-automatic pistol, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute 500 grams or more of cocaine, as alleged in Count Two of this Indictment.

All in violation of 18 U.S.C. § 924(c)(1)(A).

Count Two
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(ii)(II)
Possession with Intent to Distribute Cocaine

2. On or about November 16, 2021, in the Eastern District of Michigan, Defendant, Jacobie Wilson, knowingly and unlawfully possessed with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(ii)(II).

Count Three
18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm

3. On or about November 16, 2021, in the Eastern District of Michigan, defendant, Jacobie Wilson, after having been convicted of a crime punishable by a term of imprisonment exceeding one year, and knowing that he had been previously convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly and unlawfully possessed, in and affecting interstate commerce, a firearm, that is, a Taurus, model PT111, 9mm, semi-automatic pistol, and a Springfield, model XDS, .45 caliber, semi-automatic pistol, and a Hi-Point, model C9, 9mm, semi-automatic pistol, and a Glock, model 19x, 9mm, semi-automatic pistol.

All in violation of 18 U.S.C. § 922(g)(1).

FORFEITURE ALLEGATION

4. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this Indictment, including but not limited to a Taurus, model PT111, 9mm, semi-automatic pistol, s/n: THT77712, and a Springfield, model XDS, .45 caliber, semi-automatic pistol, s/n: S3165989, and a Hi-Point, model C9, 9mm, semi-automatic pistol with a partially obliterated serial number, and a Glock, model 19x, 9mm, semi-automatic pistol, s/n: BTES058, ammunition, and money.

5. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL

s/GRAND JURY FOREPERSON
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ANTHONY P. VANCE
ANTHONY P. VANCE
Chief, Branch Offices

s/BLAINE LONGSWORTH
BLAINE LONGSWORTH
Assistant United States Attorney

Dated: 11/16/2022

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it a

Companion Case Information	Co
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: BL

Case Title: USA v. JACOBIE ANTWAN WILSON

County where offense occurred: Genesee

Offense Type: Felony

Superseding Case Information

Superseding to Case No: _____ Judge: _____

Reason:

Defendant Name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

November 16, 2022

Date

Blaine Longworth

Blaine Longworth
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.